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MEMORANDUM

Received

TO: Larry Strickling, Chief, ~~FEDERAL COMMUNICATIONS COMMISSION~~  
~~COMMON CARRIER BUREAU~~ Bureau

JAN 03 2000

FROM: John Hoffman, NANC Chair

DATE: November 16, 1999

RE: NPA Splits

Common Carrier Bureau  
Network Service Division  
Office of the Chief

CC DOCKET: 99-200

As you know, the New York Public Service Commission (NYPSC) on October 27, decided to split the 914 NPA along the Westchester and Putnam county boundaries (splitting rate centers). The NYPSC has asked the NANPA to issue a new NPA by the end of this week, in order to implement this decision.

Today, NANC discussed the NYPSC's decision and instructed NANPA to deny the request for a new NPA based on this relief plan. NANC concluded that the NYPSC's decision was inconsistent with Industry Numbering Committee (INC) guidelines, effective August 30, 1999, and the NANC policy, articulated in Chairman Hasselwander's August 26, 1999 letter to you. The splitting of rate centers can lead to a premature exhaust of the affected NPA, and can affect the implementation of local number portability (LNP) and cause other technical problems.

Because of the seriousness of this matter, I wanted to be sure that you are personally aware of these recent developments. If NANC's directions to NANPA are a concern to the Federal Communications Commission (FCC), the NANC requests that the Bureau review the industry guidelines and provide policy direction to the NANPA on this matter. Due to the severe number shortage situation in the 914 area, your expeditious review of this matter is appreciated.

You should also know that, while the NARUC representatives support NANC policies and goals, the NARUC representatives understand and support state commissions' need for flexibility when dealing with NPA relief within their borders.

CC: New York Public Service Commission  
John Manning, NANPA  
NANC Members  
Yog Varma, Chuck Keller, Blaise Scinto, Diane Harmon, Jeannie Grimes

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE  
THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

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General Counsel

DEBRA RENNER  
Acting Secretary

November 18, 1999

Lawrence Strickling, Chief  
Common Carrier Bureau  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
Washington, DC 20554

RE: North American Numbering Council Action Regarding 914  
Area Code Split

Dear Mr. Strickling:

On November 16, 1999, the North American Numbering Council (NANC) Chairman sent you a memorandum stating that NANC had directed the North American Numbering Plan Administrator (NANPA) to deny the New York Public Service Commission's (NYPSC) request for a new NPA code for the 914 area code split.<sup>1</sup> We ask that you direct the immediate release of the code.<sup>2</sup>

Pursuant to the Federal Communications Commission delegation of authority to establish area codes, the NYPSC directed the local exchange carriers in the 914 NPA to act in cooperation with the NANC to take the necessary steps to promptly activate a new area code for the existing 914 NPA, exclusive of Westchester County.<sup>3</sup> The decision to authorize an area code split along the county line was based upon extensive input from

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<sup>1</sup> Today we received a letter from the NANPA denying our request for a new code (See attached).

<sup>2</sup> We question NANC's authority and rationale for instructing NANPA to deny New York's request.

<sup>3</sup> Case 99-C-0800, Opinion and Order Directing A Geographic Split of the 914 NPA (issued November 4, 1999).

the industry and from the consumers affected by the decision.<sup>4</sup> The NYPSC decision rests upon strong public support for an area code split, rather than an overlay.<sup>5</sup> The split of the Westchester County line is readily recognizable by the general public and both NPAs will be spared from further exhaust for roughly an equal period of time. Attached is the NYPSC Order.

There are five rate centers that will be split. Approximately 10 to 20 NXX codes will need to be duplicated (no more than 2.6% of the additional NXX resources being created by the relief plan). (Attached is a fact sheet.) Each affected NXX code will, of course, have more numbers available for assignment than it would absent the split. Further, not all existing NXX codes in these five rate centers will need to be duplicated. For example, only those companies that currently serve customers on both sides of the county line would be subject to duplication. Some companies either are serving only on one side of the line or are not fully utilizing NXX codes.

The 10 to 20 codes that will be duplicated represent number resources available to meet future number demands on both sides of the county line. All of the rate centers being split are multiple NXX rate centers. At current growth rates, these number resources will most likely be necessary during the projected life of the relief plan, and their assignment at the outset of the relief plan will not adversely affect its life.

In addition, there is an ongoing NYPSC proceeding to examine, among other things, further consolidation of rate centers, including rate centers that are affected by splits. We will keep you apprised of the outcome of this proceeding.<sup>6</sup>

Finally, to further conserve numbers, one-third of the newly available NXX codes in the new area code and the newly available NXX codes in the 914 area code have been reserved for thousand block pooling.

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<sup>4</sup> Seven public statement hearings occurred in the affected counties.

<sup>5</sup> The industry was divided. AT&T, MCI and Sprint preferred a split, while Bell Atlantic-New York, Bell Atlantic-Mobile and Focal Communications supported an overlay.

<sup>6</sup> Case 98-C-0689, Omnibus Telephone Numbering Resource Proceeding, Opinion No. 99-6 (issued April 29, 1999).

Your attention to this critically important issue is most appreciated.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Lawrence G. Malone".

Lawrence G. Malone  
General Counsel

Attachments

cc: Ronald Connors, Lockheed Martin  
John Hoffman, NANPA  
NANC Members  
Yog Varma, FCC  
Chuck Keller, FCC  
Blaise Scinto, FCC  
Diane Harmon, FCC  
Jeanine Grimes, FCC

Lockheed Martin IMS  
Communications Industry Services  
1133 15th Street, N.W. Washington, D.C. 20005  
Telephone 202-736-5600 Facsimile 202-887-0331



November 18, 1999

By Overnight Courier

Debra Renner, Acting Secretary  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

Re: Case 99-C-0800 – In the Matter of an Investigation of the  
Efficient Usage of Telephone Numbering Resources and  
Evaluation of the Options for Making Additional Central  
Office Codes and/or Area Codes Available in New York State

Dear Ms. Renner:

Pursuant to the NPA Code Relief Planning & Notification Guidelines<sup>1</sup> and a directive from the North American Numbering Council ("NANC"), the North American Numbering Plan Administrator Lockheed Martin IMS ("NANPA"), as a neutral third party administrator, hereby notifies the New York Public Service Commission ("Commission") that the New York telecommunications industry request for a new relief NPA code as ordered by the Commission in its November 4, 1999 order directing a geographic split of the 914 NPA (the "914 Order")<sup>2</sup> is denied.<sup>3</sup>

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<sup>1</sup> NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016 Aug. 30, 1999) ("NPA Code Relief Planning Guidelines") at §§ 2.11 and 6.1. The NPA Code Relief Planning Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/cle/inc/incdocs.htm>>. FCC rules require NANPA to assign and administer NANP resources in an efficient, effective, fair, unbiased, and non-discriminatory manner consistent with industry-developed guidelines and Commission regulations. 47 C.F.R. §52.13(b)(3), (d).

<sup>2</sup> *In the Matter of an Investigation of the Efficient Usage of Telephone Numbering Resources and Evaluation of the Options for Making Additional Central Office Codes and/or Area Codes Available in New York State*, Opinion and Order Directing a Geographic Split of the 914 NPA, Case 99-C-0800 (Nov. 4, 1999).

<sup>3</sup> The application for the relief NPA code was submitted by Frank Colaco, NPA Relief Planner, NANPA, on behalf of the New York telecommunications industry on November 9, 1999.

Debra Renner, Acting Secretary  
November 17, 1999  
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The NANC has instructed NANPA to deny the request for a new 914 relief NPA because the Commission's 914 Order is inconsistent with the NPA Code Relief Planning and Notification Guidelines<sup>4</sup> and NANC policy<sup>5</sup> which require that NPA boundaries follow rate center boundaries. The NANC has notified the Federal Communications Commission ("FCC") of its decision.<sup>6</sup>

In its 914 Order, the Commission ordered a geographic split as the means of relief for the 914 NPA. The Commission ordered the new NPA boundary to follow the Westchester County line, which results in rate centers being split between the new NPA and the existing 914 NPA. When rate center boundaries are divided as a result of NPA splits, existing carriers must duplicate central office ("CO") codes in each NPA for each split rate center in order for customers to maintain their existing seven-digit telephone numbers. Thus, carriers that operate in split rate centers will require two CO codes rather than one in order to establish service in that rate center. The duplication of CO codes is an inefficient use of numbers that will lead to the premature exhaust of the affected NPA as well as the North American Numbering Plan.<sup>7</sup>

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<sup>4</sup> NPA Code Relief Planning Guidelines at §§ 2.11 and 6.1.

<sup>5</sup> See Letter from Alan C. Hasselwander, Chairman, North American Numbering Council to Lawrence E. Strickling, Chief, Common Carrier Bureau, Federal Communications Commission (Aug. 26, 1999).

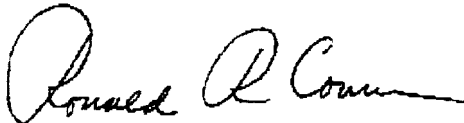
<sup>6</sup> Memorandum from John Hoffman, NANC Chair, to Larry Strickling, Chief, Common Carrier Bureau, FCC (Nov. 16, 1999).

<sup>7</sup> In reviewing NPA assignment requests, NANPA utilizes the NPA Allocation Plan and Assignment Guidelines (INC 97-0404-016 Aug. 30, 1999) ("NPA Assignment Guidelines"). One of the primary assignment principles of the NPA Assignment Guidelines is to promote the efficient and effective use of a finite numbering resource. The NPA Assignment Guidelines can be accessed on the Alliance for Telecommunication Industry Solutions ("ATIS") web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

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November 17, 1999  
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Thus, consistent with the NANC directive and the NPA Code Relief Planning Guidelines, NANPA hereby denies the request for a new 914 relief NPA.<sup>8</sup> The Commission may submit to NANPA a request for a relief NPA consistent with the NPA Code Relief Planning Guidelines or, may appeal the denial to the appropriate governmental/regulatory body consistent with the appeals process described in the NPA Assignment Guidelines.<sup>9</sup>

Sincerely,



Ronald R. Conners  
Director - North American Numbering Plan Administration

Enclosure

Copy to: Yog Varma, Chuck Keller, Blaise Scinto, - FCC  
Diane Harmon, Jeannie Grimes, Jared Carlson - FCC

John Hoffman - NANC Chair

Service List

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<sup>8</sup> As the NPA Code Administrator, NANPA must respond in writing regarding its decision within 10 working days from receipt of the assignment request form in one of four ways: 1) grant the assignment; 2) deny the assignment; 3) require further information; or 4) refer the request to the Industry Numbering Committee ("INC"). NPA Assignment Guidelines at §5.2. and §5.2(b).

<sup>9</sup> NPA Assignment Guidelines at §8.0.

## 914 Area Code Split FACT Sheet

The Westchester/Putnam County line bisects five rate centers with an aggregate total of 20 NXX codes (13 Bell Atlantic and 7 CLEC) as follows:

- a) Peekskill Rate Center
  - Bell Atlantic Access Lines: 30,836
  - NXX Codes:*
  - Bell Atlantic: 6
  - MCI Metro: 1
  - RCN Telecom: 1
  - Total NXX Codes: 8
  
- b) Lakeland Rate Center
  - Bell Atlantic Access Lines: 13,218
  - NXX Codes:*
  - Bell Atlantic: 2
  - ACC National (AT&T): 1
  - Teleport Comm (AT&T): 2
  - Total NXX Codes: 5
  
- c) Croton Falls Rate Center
  - Bell Atlantic Access Lines: 4,830
  - NXX Codes:*
  - Bell Atlantic: 1
  - Teleport Comm(AT&T): 1
  - Total NXX Codes: 2
  
- d) Mahopac Rate Center
  - Bell Atlantic Access Lines: 13,940
  - NXX Codes:*
  - Bell Atlantic: 2
  - Frontier Local Svcs: 1
  - Total NXX Codes: 3
  
- e) North Salem Rate Center
  - Bell Atlantic Access Lines: 5,134
  - NXX Codes:*
  - Bell Atlantic: 2
  - Total NXX Codes: 2